

**CPNI CERTIFICATION**

**EB Docket No. 06-36**

MAR - 1 2010

FCC Mail Room

**Annual 64.2009(e) CPNI Certification for: 2009**

**Date filed:** 2/23/10

**Name of Company Covered  
by this Certification:** City of Thomasville, Georgia

**Form 499 Filer ID:** 819600

**Name of Signatory:** Lynn Williams

**Title of Signatory:** Assistant City Manager – Customer Services

I, Lynn Williams, certify that I am an officer of the City of Thomasville, Georgia ("Thomasville"), and acting as an agent of Thomasville, that I have personal knowledge that Thomasville has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules.

Attached to this Certification as Exhibit "A" is an accompanying statement explaining how Thomasville's procedures ensure that Thomasville is in compliance with the requirements set forth in Section 64.2001 et seq. of the Commission's rules. Attached as Exhibit "B" is the City of Thomasville Privacy Policy.

The City of Thomasville had no CPNI customer complaints or unauthorized data breaches for the 2009 calendar year. Thomasville has taken no action against any data brokers. Should Thomasville receive a complaint or become aware of such a data breach, we will inform the proper customers and/or authorities. All such records will be maintained and a summarized report filed the following year.

The Company represents and warrants that the above certification is consistent with 47.C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action

The City of Thomasville, Georgia

By:   
Lynn Williams

Assistant City Manager – Customer Services

**Attachments:**      Accompanying Statement explaining CPNI procedures  
City of Thomasville Privacy Policy

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## **STATEMENT OF EXPLANATION**

The City of Thomasville, Georgia ("Thomasville"), has a Privacy Policy in place, and all employees are required to read and acknowledge they have read and are familiar with its contents. All employees of Thomasville who have access to CPNI information have been briefed and are fully aware of the disclosure rules regarding CPNI data. That Privacy Policy can be viewed on Thomasville's web site at <http://www.cns-internet.com/services.thomasville.telephone.shtml>, and a copy is attached as Exhibit "B" to the foregoing Annual 47 C.F.R. §:64.2009(e) CPNI Certification of Thomasville.

**EXHIBIT "A"**

# **The City of Thomasville Privacy Policy**

## **Respecting and Protecting Customer Privacy**

We respect and protect the privacy of our customers. As a provider of telecommunications and other utility related services, we recognize that we must maintain the confidentiality of every customer's telephone calling records and other account information. We recognize that we have an obligation to assist law enforcement and other government agencies responsible for protecting the public safety, whether it is an individual or the security interest of the entire nation. If we are asked to help, we will do so strictly within the law and under the most stringent conditions.

## **Personal Identifying information we collect and how we use it**

- We collect personal identifying information regarding our customers, including information customers give us, information collected as a result of the customer's relationship with us, and information we obtain from other sources. Examples include; name, address, e-mail address; telephone number; billing, payment, usage, credit and transaction information (including credit card numbers, account numbers and/or social security number).
- We use the personal identifying information of a customer to provide, confirm, change, bill, monitor and resolve problems with the service the City of Thomasville offers its customers.
- We may aggregate the personal identifying information of different customers. For example we might use aggregate data about the types of services our customers have generally purchased at the same time in order to develop more attractive bundled service offerings. Such aggregate data will not reflect any personal identifying information of any specific customer.

## **Personal identifying information we disclose to third parties**

- We do not provide personal identifying information (other than information we provide to directories and directory assistance services) to third parties for marketing of their products and services without your consent.
- We may provide personal identifying information to third parties who perform functions or service on our behalf. Examples include long distance providers who carry customer long distance traffic on our behalf.
- When we provide such personal identifying information the third parties to perform such functions or services on our behalf, we require that they protect personal identifying information consistent with this policy and do not allow them to use such information for other purposes.

- We may, when permitted or required by law, provide personal identifying information to third parties (including credit bureaus or collection agencies) without your consent:
  - To obtain payment for City of Thomasville products and services, enforce or apply our customer agreements, and/or protect our rights or property.
  - To comply with court orders, subpoenas, or other legal or regulatory requirements
  - To prevent unlawful use of communications or other services, to assist in repairing network outages, and when a call is made to 911 from a customer phone and information regarding the callers location is transmitted to a public safety agency
  - To notify a responsible governmental entity if we reasonably believe that an emergency involving immediate danger of death or serious injury to any person requires or justifies disclosure without delay.
  - A customer's name and telephone number may also be transmitted and displayed on a caller ID device unless the customer has elected to block such information. Caller ID Blocking does not prevent the display of the number when you dial certain business numbers, 911, 900 numbers or toll-free 800, 877, or 866 numbers.

#### **Directories and directory assistance service**

- We furnish and distribute information to directory services companies. These directories include limited personal identifying information about our customers (published customer names, addresses and telephone numbers) without restriction to their use. We also make that information available through directory assistance operators and through the Internet.
- We are required by law to provide published customer names, addresses and telephone numbers (or non-published status) to unaffiliated directory publishers and directory assistance providers, over whom The City of Thomasville has no control. This directory information is not legally protected by copyrights and may be sorted, packaged, repackaged and made available again in different formats by anyone.

#### **Non Published and Non-Listed numbers**

- When a customer subscribes to The City of Thomasville local telephone service, we offer the opportunity for the customer to request that their name, number, and address not be published by our directory services provider or made available through our directory assistance provider.
- The names, numbers and addresses of customers who choose to have a "non-published" number will not be available in directories or through directory assistance. Likewise, we do not make non-published numbers available to others to include in directories or to provide directory assistance services.
- The names, numbers and addresses of customers who choose to have a "non-listed" number will not be available in The City of Thomasville provided directories, but the information will be publicly available through directory assistance and will be provided

to unaffiliated directory assistance providers over whom The City of Thomasville exercises no control.

- There is a fee for customers who choose to have non-published or non-listed telephone numbers. Customers may choose to exclude partial or all address information from their listings.

### **Do Not Call Lists**

- We comply with all applicable laws and regulations regarding "Do Not Call" lists. These laws generally permit companies to contact their own customers even though such customers are listed on the federal and, in some instances, state "Do Not Call" lists.
- Residential consumers may request that they be removed from The City of Thomasville's telemarketing lists at any time, including when a City of Thomasville marketing and promotional call is received or by contacting the City of Thomasville.

### **Customer Proprietary Network Information**

- In the normal course of providing telecommunications services to our customers, we collect and maintain certain customer proprietary network information, also known as "CPNI". Your CPNI includes the types of telecommunications services you currently purchase, how you use them and related billing information for those services. Your telephone number, name and address are not CPNI.
- Protecting the confidentiality of your CPNI is your right and our duty under federal law. We do not sell trade or share your CPNI - including your calling records - with anyone outside of the City of Thomasville family of companies or with anyone not authorized to represent us to offer our products or services or to perform functions on our behalf except as may be required by law or authorized by you.
- As a general rule, we are permitted to use CPNI in our provision of telecommunications services you purchase, including billing and collections for those services. We are permitted to use or disclose CPNI to offer telecommunications services of the same type that you already purchase from us. We may also use or disclose your CPNI for legal or regulatory reasons such as a court order, to investigate fraud or to protect against the unlawful use of our telecommunications network and services and to protect other users.

### **HOW WE PROTECT YOUR INFORMATION**

- All City of Thomasville employees are subject to certain state-mandated codes of conduct. The Code specifically requires compliance with legal requirements and company policies related to the privacy of communications and the security and privacy of customer records. Employees who fail to meet any of the standards embodied in the Code of Business Conduct may be subject to disciplinary action, up to and including dismissal.

- We employ security measures designed to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data, including personal identifying information.
- We have implemented technology and security features and strict policy guidelines to safeguard the privacy of your personal identifying information, and we will continue to enhance our security procedures as new technology becomes available. For example:
  - We maintain and protect the security of our servers and we typically require user names and passwords to access sensitive data.
  - We use industry standard encryption methods to protect your data transmission unless you authorize unencrypted transmission.
  - We limit access to personal identifying information to those employees, contractors, and agents who need access to such information to operate, develop, or improve our services and products.
  - If we determine that a security breach has occurred and that such breach creates a risk of identity theft or service disruption, we will make reasonable attempts to notify you.

The City of Thomasville is happy to address any concerns you may have about our privacy practices and policies. You may write us at City of Thomasville, P.O. Box 1397, Thomasville, GA. 31799, or by calling your local customer service agent.